

WILMER HALE

December 12, 2012

MEMO ENDORSED**Via Facsimile**

The Honorable Laura Taylor Swain
 United States District Court for the
 Southern District of New York
 Daniel Patrick Moynihan Courthouse
 500 Pearl Street
 New York, NY 10007

Re: *Ermini v. Vittori*, Case No. 12-cv-06100 (LTS)(HJP)

Dear Judge Swain:

We represent Respondent Viviana Vittori in the above-referenced action. Pursuant to Sections 1.a. and 1.e. of your Individual Practices, we write to request modifications to our current schedule for expert disclosures and discovery. Counsel for Petitioner Emiliano Ermini consents to this request. We are not requesting any change to our trial date of January 28, 2013, and no other discovery deadlines would be affected. Our co-counsel Ellen Holtzman previously was granted two adjournments of the preliminary pre-trial conference in this matter. Our proposed modifications are as follows:

Current schedule for expert disclosures and discovery

- Deadline for Rule 26(a)(2) disclosures: December 21, 2012
- Deadline for completion of all expert witness discovery: January 11, 2013

Proposed schedule for expert disclosures and discovery

- Deadline for disclosure of names of any experts and the subject matter on which each expert is expected to testify: December 21, 2012
- Deadline for Rule 26(a)(2) disclosures: January 11, 2013
- Deadline for completion of all expert witness discovery: January 18, 2013

Thank you for your attention to this matter.

Respectfully submitted,

Jacob Press

cc: Rocco Lamura, Esq. (via email)
 Jacqueline Sands, Esq. (via email)

*The requested modifications
are approved.*

SO ORDERED.

*Laura Taylor Swain
U.S. District Court, S.D.N.Y.
December 13, 2012*